

IN THE UNITED STATES COURT OF FEDERAL CLAIMS

)	
ELEAZAR AVALOS, et al.)	
)	Case No. 19-cv-0048
Plaintiffs,)	Judge Patricia E.
)	Campbell-Smith
)	
v.)	Collective Action
)	
UNITED STATES OF AMERICA,)	
)	
Defendant.)	
_____)	

PLAINTIFFS' MOTION TO CONSOLIDATE

Plaintiffs move to consolidate this case with three other related cases pending before the Court: Tarovisky v. United States, No. 19-04C, Arnold v. United States, No. 19-59C, and Rowe v. United States, No. 19-67C. Plaintiffs also request that if the cases are consolidated, the Court appoint counsel in Tarovisky as lead counsel for the consolidated Plaintiffs Group. In support of this motion, plaintiffs incorporate and adopt the arguments set forth in the Motion to Consolidate, Tarovisky v. United States, No. 19-04C (Dkt. #141) (February 12, 2021).

Respectfully submitted,

/s Gregory O'Duden, by /s Allison C. Giles

GREGORY O'DUDEN

General Counsel

NATIONAL TREASURY EMPLOYEES UNION

800 K Street, N.W., Suite 1000

Washington, D.C. 20001

Tel: (202) 572-5500

Fax: (202) 572-5645

greg.oduden@nteu.org

Counsel of Record for Plaintiffs

Julie M. Wilson

Allison C. Giles

NATIONAL TREASURY EMPLOYEES UNION

800 K Street, N.W., Suite 1000

Washington, D.C. 20001

Tel: (202) 572-5500

Fax: (202) 572-5645

julie.wilson@nteu.org

allie.giles@nteu.org

Of Counsel for Plaintiffs

Leon Dayan

Abigail Carter

BREDHOFF & KAISER PLLC

805 15th Street N.W., Suite 1000

Washington, D.C. 20005

Tel: (202) 842-2600

Fax: (202) 842-1888

ldayan@bredhoff.com

acarter@bredhoff.com

February 17, 2021

Of Counsel for Plaintiffs

CERTIFICATE OF SERVICE

I certify that, on February 17, 2021, I electronically filed the foregoing document with the Clerk of the Court for the United States Court of Federal Claims through the CM/ECF system.

/s Gregory O'Duden, by /s Allison C. Giles
GREGORY O'DUDEN
Counsel of Record